

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

**FILED**

2013 APR 19 P 2:46

\_\_\_\_\_  
**UNITED STATES OF AMERICA**

v.

\_\_\_\_\_  
**JOSEPH CARAMADRE, and  
RAYMOUR RADHAKRISHNAN**

U.S. DISTRICT COURT  
DISTRICT OF RHODE ISLAND

**Criminal No. 1:11-cr-00186-S**

**MOTION TO FILE UNDER SEAL**

Now comes the defendant, through counsel, and hereby moves this Honorable Court for leave to file the accompanying evidence pertaining to his "Motion to Withdraw Plea of Guilty", under seal. For reason, counsel believes that given the high profile nature of the case, as well as the nature of the evidence itself, that the Court should review the filing under seal in the first instance.

Respectfully submitted,  
Joseph Caramadre,  
By his attorneys,

\_\_\_\_\_  
Randy Olen, Esq.  
478A Broadway  
Providence, RI 02909  
(401) 274-1400  
(401) 274-2480 (fax)

\_\_\_\_\_  
Robert D. Watt, Jr., Esq.  
84 Ship Street  
Providence, RI 02903  
(401) 273-0484  
(401) 453-4906 (fax)

**CERTIFICATION**

I hereby certify that on this 19<sup>th</sup> day of April, 2013, I caused to be delivered, via first class mail, the within ***Motion*** to:

John P. McAdams, Esq.  
U.S. Attorney's Office  
50 Kennedy Plaza, 8<sup>th</sup> Floor  
Providence, RI 02903

Lee Vilker, Esq.  
U.S. Attorney's Office  
50 Kennedy Plaza, 8<sup>th</sup> Floor  
Providence, RI 02903

Olin W. Thompson, Esq.  
Federal Defender's Officer  
10 Weybosset Street, Suite 300  
Providence, RI 02903,

A handwritten signature in black ink, appearing to be 'L. Vilker', is written over a horizontal line.